

CHRISTOPHER CHIOU, State Bar No. 233587
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
953 East Third Street, Suite 100
Los Angeles, CA 90013
Telephone: (323) 210-2900
Facsimile: (866) 974-7329
Email: cchiou@wsgr.com

Counsel for Defendants Google LLC and YouTube, LLC

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**DECLARATION OF CHRISTOPHER
CHIOU IN SUPPORT OF OMNIBUS
SEALING STIPULATION
REGARDING DKT. NO. 1974**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

I, Christopher Chiou, declare as follows:

1. I am a partner at the law firm of Wilson Sonsini Goodrich & Rosati and attorney of record for Defendants YouTube, LLC and Google LLC (collectively “YouTube”) in *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, Case No.: 4:22-md03047-YGR. I am licensed to practice law in the state of California and am admitted to practice before this Court. I submit this declaration in support of the Omnibus Sealing Stipulation in connection with the Parties’ Joint Letter Brief re YouTube’s Search and Production from Noncustodial Source “B” (ECF No. 1974). I have personal knowledge of the facts set forth in this declaration, and I could and would testify competently to their truth if called upon to do so.

2. On May 23, 2025, the Parties filed the Parties’ Joint Letter Brief re YouTube’s

1 Search and Production from Noncustodial Source “B” (ECF No. 1974).

2 3. I have reviewed the document that YouTube seeks to seal pursuant to the Court’s
3 Order Granting Motion to File Under Seal; Setting Sealing Procedures (ECF No. 341). Based on
4 my review of the document and in consultation with YouTube, I understand there is good cause
5 to seal the following information:

Dkt. No.	Description	Basis for Sealing
1974	Joint Letter Brief re YouTube’s Search and Production from Noncustodial Source “B” redacted at 1–5, with undisputed modifications to remove redactions from (a) four bulleted items on page 1, (b) the paragraph running from page 1-2, and (c) footnote 7.	The redacted portions consist of sensitive and confidential information about YouTube’s platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube’s business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.

12
13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct. Executed at Los Angeles, California on June 13, 2025.

15 /s/ Christopher Chiou
16 Christopher Chiou